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DEPT. OF TRANSPORTATION
DOCKETS
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January 30, 2001

Docket Management System
U.S. Department of Transportation
Room Plaza 401
400 Seventh Street, SW
Washington, DC 20590-0001

RE: Notice of Proposed Rulemaking on Licensing and Safety Requirements for Launch;
Docket No. 2000-7953; Notice No. 00-10- 3

Dear Sir or Madam:

The purpose of this letter is to request, on behalf of Lockheed Martin Corporation, Orbital Sciences Corporation, the Boeing Company, Sea Launch Company, L.L.C., and International Launch Services, a one hundred eighty (180) day extension of time within which to submit comments on the above referenced Notice of Proposed Rulemaking for Licensing and Safety Requirements for Launch. This NPRM proposes to amend existing regulations to codify the license application process for launch from a non-federal launch site. It also intends to codify the safety requirements for launch operators in connection with launches from both federal launch ranges and non-federal launch sites. The NPRM currently requires that comments be received on or before February 22, 2001.

We recognize that the Office is striving to maintain a strict rulemaking schedule and that the requested extension period is not insignificant. However, it is our collective belief that the extension is both reasonable and necessary given the size and complexity of the document and the considerable effect it will have on the commercial launch industry and its international competitiveness. Substantial issues are raised by the NPRM, such as the level of detail of the requirements, the ability to "grandfather" existing launch vehicle designs under the proposed regulations, the additional requirements imposed over those in the existing Range Safety Requirements document and the potential cost impact. The extension of time requested by industry is needed to fully assess the ramifications of the proposed changes raised by the NPRM and, to the maximum extent possible, develop an industry consensus and provide to the Office a unified set of general comments. Each company will still be able to submit its own individual comments with respect to those issues where there is not a common position or concern.

While the extension entails an additional investment of time on the front end by the FAA, it is our belief that the overall review process will be reduced as a result of receiving this consolidated set of industry comments. In addition, allowing the extension will enable us to provide the Office with more thoughtful and responsive comments increasing the likelihood of a final rule that provides for adequate safety and can be implemented in a cost effective manner by our nation's launch industry.

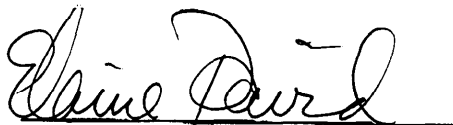
We are also considering using the additional time to meet and/or file a statement with the appropriate COMSTAC Working Group in connection with the NPRM. In addition, we are working with or intend to involve Spaceport Florida, Alaska Aerospace Development Corporation and Astrotech.

Accordingly, we respectfully request an additional one hundred eighty (180) days to submit comments to the NPRM. Thank you for your consideration.

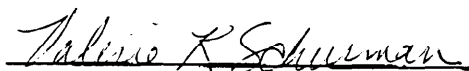
Sincerely,



Mark Bitterman
Senior Vice President,
Government Relations
Orbital Sciences Corporation



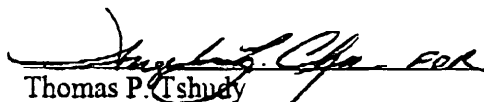
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Ellen A. Whelan
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cc: Ms. Patricia Grace Smith
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